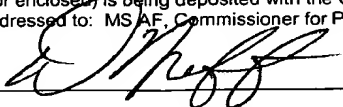| PRE-APPEAL BRIEF REQUEST FOR REVIEW	Docket Number (Optional) SONYJP 3.0-147

	Application Number 09/812,163-Conf. #9368	Filed March 19, 2001
	First Named Inventor Keiji Yuzawa	
	Art Unit 2154	Examiner Jungwon Chang

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).
 Note: No more than five (5) pages may be provided.

I am the

☐ applicant /inventor.

☐ assignee of record of the entire interest.
 See 37 CFR 3.71. Statement under 37 CFR 3.73(b)
 is enclosed. (Form PTO/SB/96)

☒ attorney or agent of record.
 Registration number _____ 38,253 _____

☐ attorney or agent acting under 37 CFR 1.34.
 Registration number if acting under 37 CFR 1.34. _____

_____
Signature

Daryl K. Neff
Typed or printed name

(908) 518-6396
Telephone number

May 3, 2006
Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.

☐ *Total of ___1___ forms are submitted.

Claims 25-44 are pending in the application. No amendment is being made at this time.

Applicants believe the invention recited in claim 25 is fully distinguished from the cited references. The combination of references proposed by the Examiner fail to show *prima facie* obviousness.

The combination of references cited by the Examiner in rejecting the claims neither teaches nor suggests the invention as recited in claim 25. *Bedard* fails to teach at least the following features recited in claim 25: selecting some received content information-containing items on the basis of information representing access priorities; selectively storing the selected content information-containing items in the user terminal; arranging the stored items of content information in an order according to access priorities; and at a user-selected time after storing the selected items, user selecting one of the stored items of content information and causing moving images and/or audio sound to be reproduced from the user-selected one of the stored items. *Bedard* merely shows the creation of a viewer profile array, which is then used to tailor the display of received electronic program guide (EPG) information. A user of the system described in *Bedard* has no ability to select a program to be reproduced from a set of programs that are stored locally at a user terminal based on the user's preferences.

Alexander does not provide the teachings which *Bedard* lacks. The passages cited by the Examiner at col. 12 of *Alexander* merely describe the reception of items according to the user's *specific* requests, such as "4 hours of CNN news broadcasts"(col. 12, lns. 15-16). *Alexander* neither teaches nor suggests selecting such content-containing items and selectively storing them on the basis of information representing the access priorities. While *Alexander* describes the use of viewer profile information in creating a "Profile Program," at best such

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program is used only to arrange an order for displaying EPG information and to determine which of several stored advertisements is to be displayed, without the user's selection of such advertisements. In addition, *Alexander* neither teaches nor suggests arranging stored items of information in an order according to access priorities, and at a user-selected time after storing the selected items, user selecting one of the stored items and causing moving images and/or audio sound to be reproduced from the user-selected item.

Finally, *Inoue* fails to provide the teachings which *Bedard* and *Alexander* lack with respect to the invention cited in claims 25. *Inoue* neither teaches nor suggests arranging stored items of information in an order according to access priorities and at a user-selected time after storing the selected items, user selecting one of the stored items and causing moving images and/or audio sound to be reproduced from the user-selected item.

Claim 35 recites an apparatus and contains analogous recitations. For the foregoing reasons, claim 35 is also believed to be allowable.

Moreover, with respect to claims 30 and 40, the combination of references fails to teach or suggest the feature of deleting at least one of a plurality of stored content-containing items from the user terminal in an order beginning with the stored item having a lowest one of the access priorities. *Bedard* merely describes deleting a channel from a list of channels that is displayable as EPG information. Neither *Alexander* nor *Inoue* provides the teachings which *Bedard* lacks with respect to the invention recited in claims 30 and 40.

Finally, applicants submit that the cited references neither teach nor suggest the particular features as specifically recited in the claims 26-29, 31-34, 36-39 and 41-44 which depend from the aforementioned claims.

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Reconsideration and withdrawal of the rejections is respectfully requested.

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